

Plf.'s Request for Production No. 11 to Espanola Defs.: Produce all documents evidencing any type of grievance, complaint, internal affairs investigation, or disciplinary action involving Defendants Joseph Salazar or Greg Esparza.

RESPONSE:

Plf.'s Request for Production No. 12 to Espanola Defs.: all documents evidencing the use of force by Defendants Joseph Salazar or Greg Esparza on any individual.

RESPONSE: